

RE: ANTONIO GADDIS

CHAPTER 13  
CASE NO. 17-43149  
JUDGE MCIVOR

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**Debtor's Chapter 13 Confirmation Hearing Certificate**

At the next confirmation hearing in this case, the debtor intends to:

1. \_\_\_ Request confirmation of the debtor's plan, because all timely objections of creditors and the trustee have been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order.

2. \_\_\_ Request confirmation of the debtor's plan, even though all timely objections have not been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order. The parties are at an impasse in attempting to resolve these objections despite all reasonable efforts. The following are: (a) the parties whose timely objections have not been resolved; (b) their unresolved objections; and (c) the legal and factual issues that must be resolved by the Court in connection with confirmation:

**REQUEST ADJOURNMENT:**

Other than debtor's car claim, there are 69,000 in unsecured claims, but one claim alone is \$59,800. That unsecured creditor has objected to confirmation, has engaged in extensive discovery of debtor's assets, has scheduled a 2004 exam. And, it appears that negotiations for withdrawal of the Objection are incomplete at this time as is creditor's discovery relative to the matter.

Debtor has made payments of \$2,205 on \$2,390 due; that is, he is 92% current in payments.

Also, debtor has filed a "Request to Discharge State-Owed Debt" over 30 days ago, was advised by representatives of the Department of Health and Human Services that his application was likely to be granted, and he would thereby resolve a potential "domestic support obligation" that arose over 20 years ago when he was residing with, and supporting, his wife and children while support benefits were accruing with the Friend of the Court. He awaits resolution of that matter.

Trustee objections requested:

P&L indicated \$450 increase monthly in recent records; and rental income was overstated by \$50;

Hence best effort should be increased by net of \$400 from 478.98 mo to 878.98 mo, set forth in OCP

Declaration of in home family rent filed 4-10-17

Amended Liquidation Analysis filed 4-25-17

/s/ Mark McLoughlin

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